BRONSON

Notification Date: **February 25th, 2026**

Laboratory

RE: Laboratory Compliance – OIG Annual Notification

Bronson Healthcare System maintains an active compliance program that reflects our commitment to conduct business in compliance with all federal, state and local laws. As a participant in federally funded healthcare programs, Bronson Lab delivers annual practitioner information and education regarding laboratory compliance, billing and coding guidelines, and to inform our practitioner clients on the responsibilities we share together. This letter serves as the annual notice to provide helpful information regarding compliant ordering and processing of clinical laboratory tests for our shared patient per Medicare/Medicaid program requirements and Bronson Compliance policies.

Medical Necessity

As the practitioner, you are responsible for documenting medical necessity in the patient's medical record, including your signature, and for providing appropriate diagnostic information in the form of ICD-10 codes to the highest level of specificity or a narrative to Bronson. The Office of Inspector General (OIG) takes the position that a practitioner who orders medically unnecessary tests for which Medicare or Medicaid reimbursement is claimed may be subject to civil penalties under the False Claims Act. Please follow long-standing federal regulations and Bronson policy that patients' medical records must include a valid laboratory order or your signed documentation of medical necessity for ordering tests.

Advance Beneficiary Notice (ABN)

Medicare will only pay for tests that meet the Medicare coverage criteria and are medically necessary for the diagnosis or treatment of the individual patient. Tests used for routine screening of patients without regard to their individual needs are not usually covered by the Medicare Program and therefore are not reimbursed. We expect that you or your staff have explained this to the patient and your order/requisition notes will reflect that the test is for screening purposes and you have obtained a completed ABN. A valid ABN includes all necessary information has been completed and includes the patient's signature.

Valid Lab Orders - Test Order Requisition

The test order requisition – electronic or printed - is the tool used to communicate your valid order to the laboratory but is NOT considered the 'valid order' as defined by Medicare. Upon request by Bronson or its payers/auditors, ordering practitioners are required to provide any/all chart documentation, including practitioner signature that reflects the actual lab order and supports the authenticity and medical necessity of the lab order(s) submitted. **Please complete the test order requisition each time with the required information as detailed above to include your signature and signs/symptoms/ICD-10.**

We encourage the completion of the hospital's Laboratory Requisition or complete order information submitted electronically via an interface. However, our laboratory will accept requisitions and orders that contain the information below, which is required by federal regulations, CLIA requirements and/or is necessary to screen the tests in the Laboratory Information System. To ensure accurate processing and testing, efficient patient identification and timely reporting of laboratory results, **valid laboratory orders** include the following:

1. Clearly printed patient's full legal name
2. Patient date of birth
3. Lab tests being ordered. ICD-10 or diagnostic narrative for tests ordered
4. Diagnosis(s) related to the test(s) being ordered
5. Ordering provider signature

   Note:

   Providers who may sign a lab order are physicians or advanced practice practitioners (APP) treating the patient:

   - Physician (MD or DO)
   - Nurse Practitioner (NP)
   - Physician Assistant (PA)
   - Certified Nurse-Midwife (CNM)
   - Clinical Nurse Specialist (CNS)

   NOTE: Registered Nurse (RN) signature is not a valid signature

Signature

If there is no valid signature, the required documentation in the patient's medical record includes the provider's intent to order the test and why the test is necessary.

- Verbal orders must be signed by the ordering provider promptly. This must be done within 7 days.
- If the order is a telephone order it must be documented by the treating provider or his/her office and the testing facility.

If Bronson receives an incomplete order requisition form **without your signature and signs/symptoms/ICD-10**, the processing of your test order may be delayed. To meet mandated valid order data requirements, Bronson will contact practitioner to clarify or provide missing elements.

AMA approved panels

These are groups of medically necessary laboratory tests that have been defined by the American Medical Association (AMA) and have been approved for reimbursement by CMS.

Acute Hepatitis Panel	Hepatitis B surface antigen, Hepatitis B core antibody IgM, Hepatitis A antibody IgM, Hepatitis C Antibody
Basic Metabolic Panel/Calcium	Sodium, Potassium, Chloride, Carbon Dioxide, Creatinine, Urea Nitrogen (BUN), Glucose, Calcium
Basic Metabolic Panel/Ionized Ca	Sodium, Potassium, Chloride, Carbon Dioxide, Creatinine, Urea Nitrogen (BUN), Glucose, Ionized Ca
Comprehensive Metabolic Panel	Sodium, Potassium, Chloride, Carbon Dioxide, Creatinine, Urea Nitrogen (BUN), Glucose, Calcium (Total), Total Protein, Albumin, AST, ALT, Alkaline Phosphatase, Total Bilirubin
Electrolyte Panel	Sodium, Potassium, Chloride, Carbon Dioxide
Hepatic Function Panel	Albumin, Alkaline Phosphatase, ALT, AST, Total Bilirubin, Direct Bilirubin, Total Protein
Lipid Panel	Cholesterol, HDL Cholesterol, Triglycerides, Calculated LDL Cholesterol, Non HDL Cholesterol
Renal Panel	Sodium, Potassium, Chloride, Carbon Dioxide, Creatinine, Urea Nitrogen (BUN), Glucose, Calcium (Total), Albumin, Phosphorus

Bronson Laboratory Custom Panels and Reflex Testing

Custom and/ Reflex custom Profiles may be used if patient specific medical necessity is recorded in the patient's medical records and the Profile's component test orders are individually and clearly delineated on the Test Order Requisition to authentic validation by the provider ordering and signing.

Documentation must accurately describe the individual tests ordered and when a panel, the individual test components listed; it is not sufficient to state 'labs ordered'.

Bronson Laboratory offers a set of custom and reflex diagnostic panels approved by our Medical Executive Committee. The Bronson Lab List of Custom Panels and Reflex Testing can be found online in the Bronson Laboratory Test Catalog under General Information.

Before ordering, carefully review the components of any laboratory test panel, whether AMA-assigned or custom/reflex developed. To the extent that you order one of these non-standard panels, the OIG has asked us to advise you of the following:

1. The Medicare program provides separate reimbursement to the laboratory for each individual component contained in the non-standard panel.
2. Ordering non-standard panels may result in the ordering of tests which are not covered, reasonable or necessary and those tests will not be billed to Medicare except for the purpose of receiving a denial; your patient, as result, may be billed.
3. Any individual who knowingly causes a false claim to be submitted may be subject to sanctions or remedies available under civil, criminal and administrative law.

Reflex Testing
Reflex testing occurs when initial test results are positive or outside normal parameters and indicate that a second related test or further testing is medically appropriate. Mandated testing criteria set by government or accrediting agencies, relevant practices in laboratory medicine, and avoidance of performing unnecessary testing help dictate which tests are subject to reflexive testing. A list of Bronson Laboratory reflex tests can be found online within the Bronson Laboratory Test Catalog under General Information: Bronson Lab List of Custom Panels and Reflex Testing.

Fee Schedule
Lastly, the Model Compliance Plan also suggests that we provide you with a copy of the Medicare laboratory fee schedule and advise you that the Medicaid reimbursement amount may be equal to or less than the amount of Medicare reimbursement. This information is being provided to advise you of federal program reimbursement the hospital will receive on tests you order. The Medicare fee schedule may be found on the CMS webpage: Medicare Laboratory Fee Schedule.

We greatly appreciate your support for our Laboratory Compliance Program. If you have any questions or comments regarding the hospital's Laboratory Compliance Program, please do not hesitate to contact one of us at the numbers listed below.

Sincerely,

Virginia Newman
Bronson Laboratory System Director
269 341-6164
newmanv@bronsonhg.org

Christine Sangalli
VP Chief Compliance Officer
Bronson Healthcare Group
269 341-6065
sangallc@bronsonhg.org